

SAAM ZANGENEH  
ATTORNEY AT LAW

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February 13, 2023

**By ECF**

Honorable Denise Cote  
United States District Judge  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

*Denied.*  
*Denise Cote*  
*2/13/23*

**RE: *United States v. Matthew Taylor Witkowski*, S1 22 Cr. 312 (DLC)**

Dear Judge Cote:

The undersigned attorney respectfully submits this letter in regards to Defendant Matthew Taylor Witkowski.

As the Court is aware, on September 19, 2022, Mr. Witkowski posted a \$1 million personal recognizance bond and was released on Special Conditions, including home confinement and GPS Monitoring. To date, the Defendant has abided by all standard and special conditions of his release.

The Defendant filed a Motion to Modify the Conditions of Release to Allow for Temporary Travel to request four separate excursions with his family, which was denied by Your Honor. Undersigned is writing to request that the Defendant is allowed to attend one excursion with his family, on Wednesday, February 15, 2023 from 3:00pm to 9:00pm, which is the Defendant's daughter's 7th birthday.

Undersigned counsel conferred in good faith with Assistant United States Attorney David Lewis, who deferred this matter to the Pretrial Services Office for the Southern District of New York, Officer Jonathan Lettieri. Officer Lettieri advised that his offices object to all leave requests for social activities for defendants on home detention.